

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden, *on behalf
of themselves and others similarly situated,*

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

Plaintiffs,

v.

National Football League and NFL
Properties LLC, successor-in-interest to NFL
Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**DECLARATION OF JAMES T. CAPRETZ IN SUPPORT OF PETITION OF
OBJECTORS PRESTON AND KATHERINE JONES FOR AWARD OF
ATTORNEYS' FEES FOR SUCCESSFUL EFFORTS TO IMPROVE
THE SETTLEMENT FOR NFL EUROPE LEAGUE PLAYERS**

James T. Capretz declares, pursuant to 28 U.S.C. § 1746, based upon his personal knowledge, information and belief, the following:

1. I am an attorney licensed to practice law in all courts in the State of California. I was admitted to the California bar in 1969. I am admitted to several federal district courts and federal appellate courts throughout the United States. I am also admitted to practice in the state of Louisiana and before the U.S Supreme Court. I was retained to represent Objectors Preston and Katherine Jones.

2. I am the principal of Capretz & Associates, a boutique consumer oriented law firm located in Newport Beach, California with a national practice that emphasizes complex civil and multidistrict litigation in its practice and is experienced in class action proceedings. In the 1992 matter of Bowling vs. Pfizer, Case No. C-1-91-256, in Federal District Court in Cincinnati, Ohio, I was appointed and still serve as Special Counsel for the class. The case resulted in a seminal worldwide class action settlement with the Pfizer pharmaceutical company for a value over \$300 million dollars to pay claims arising from defective prosthetic heart valves. In 2000, I was appointed co-lead counsel in the Minnesota based MDL No. 1396 In Re St. Jude Medical Inc., Silzone Heart Valve Product Liability Litigation. This was a class action on behalf of medical patients wearing a prosthetic heart valve known as a St. Jude Silzone valve. The class was certified by federal judge John Tunheim. Viable individual claims have been settled through this date over a period of years of litigation. Also, I served as Co-Lead counsel in the San Diego class action known as Shames vs. The City of San Diego, Case No. GIC831539. This case was on behalf of the residents of San Diego who were overcharged for certain sewer taxes; the city settled for \$40 million dollars. I also have served as a State Liaison Counsel in the MDL proceedings known as In Re Propulsid Products Liability Litigation, MDL No. 1355, before Judge Eldon E. Fallon in New Orleans, Louisiana and on the Plaintiffs' Steering Committee in the matter of In Re Medtronic Inc., Sprint Fidelis Leads Product Liability Litigation, MDL No. 1905, in the United District Court, District of Minnesota. I also was selected to assist the Plaintiffs Steering Committee In re Avandia Marketing, Sales, Billing Practices and Products Liability Litigation MDL No. 1871. I was recently co-lead counsel in the cell phone tax class action matter of Carla Villa and Vanessa Garza vs. City of Chula Vista which case was settled for a value of close to ten million dollars and the settlement was found to be fair, adequate and reasonable by the court on December 12, 2013.

Other class actions or complex litigation cases in which I have been involved include, but are not necessary limited to: In Re Microsoft Corp. Windows Operating Systems Antitrust Litigation, MDL No. 1332 (Maryland); In Re Warfarin Sodium Antitrust Litigation, MDL No. 1232 (Delaware); Allec v. Cross Country Bank, OCSC Class Action No. 802894 (California); In Re Rezulin Product Liability Litigation, MDL No. 1348 (New York); In Re diet Drugs, MDL No. 1203 (Pennsylvania); In Re Silicone Gel Breast Implants Products Liability Litigation MDL No. 926 (Alabama); and, In Re Synthroid Marketing Litigation, MDL No. 1182 (Illinois).

3. The matters stated herein are personally known to me, and if called as a witness in the above case, I could so testify.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27th day of March, 2017.

/s/ James T. Capretz

James T. Capretz
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